



**Response to NCG's Questions on Heavy Metals in Dark Chocolate
January 6th, 2023**

1. What practices does your brand currently employ to ensure that your products are safe and free of harmful heavy metals?
 - Alter Eco understands that heavy metals (especially cadmium) are naturally occurring chemical elements in the earth's soil, which can be absorbed by the roots of cacao trees used to make our plant-based products. We employ good agricultural practices and good manufacturing practices to ensure that no heavy metals are introduced into our products from human activity at any point in our production process.
2. Do you all test finished products for heavy metals?
 - Yes, we have a testing and monitoring program in place for heavy metals in our finished products.
3. What practices does your brand employ in your sourcing to ensure that your suppliers are testing for the presence of harmful heavy metals?
 - We receive periodic heavy metals testing from our production partners. Additionally, we source cacao beans from regions where soil has lower heavy metals content to ensure we are delivering the safest and highest quality products to our customers.
4. Does your brand currently offer any products that have reliably and consistently tested below California's Maximum Allowable Dose Levels for these metals? If so, which products?
 - Any trace levels of heavy metals detectable in our products are naturally occurring. California's Proposition 65 law, which sets Maximum Allowable Dose Levels, provides an exemption for food containing naturally occurring chemicals including heavy metals in soil where the food is grown. See Cal. Code Regs, tit. 27, § 25501.
5. What changes in sourcing/testing are underway or planned as a result of Consumer Reports' research?
 - Even before the Consumer Reports publication, Alter Eco had already taken proactive steps to reduce any residual heavy metals by reformulating its products. This was accomplished by sourcing cacao beans from regions with lower heavy metal content in the soil where the beans are grown, and blending with cacao from other regions. We will continue to do our best to ensure that our customers only receive the safest and highest quality products.
6. Solving the heavy metal contamination issue is an industrywide issue. Is your brand working with any industry groups/brand coalitions to solve this challenge?
 - Alter Eco remains committed to delivering the safest and cleanest products to its valued customers, and it has taken proactive steps to do so on an individual basis. As this is an industry wide issue, our team is closely following new research developments and expert investigations on this topic as they become available.
